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Attorneys for Defendant
Bitmain Technologies, Ltd.

Additional Counsel Listed on Signature Page

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

GOR GEVORKYAN, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

BITMAIN, INC., BITMAIN
TECHNOLOGIES, LTD., and DOES 1 to 10,

Defendants,

Case No. 3:18-cv-07004-JD

**JOINT STIPULATION (1) UNDER
LOCAL RULE 6-1(a) EXTENDING
DEFENDANT BITMAIN
TECHNOLOGIES LTD.'S TIME TO
RESPOND TO THE COMPLAINT; (2)
UNDER LOCAL RULE 6-2 SETTING
BRIEFING SCHEDULE ON MOTION
TO DISMISS COMPLAINT; AND (3)
RESETTING CASE MANAGEMENT
CONFERENCE**

Complaint Filed: November 19, 2018
Trial Date: None Set

1 Plaintiff Gor Gevorkian (“Plaintiff”) and Defendant Bitmain Technologies, Ltd.
 2 (“Defendant”) (together with Plaintiff, the “Parties”), hereby stipulate and agree as follows:

3 **WHEREAS**, on November 19, 2018, Plaintiff filed his original Complaint against
 4 Defendant and Bitmain, Inc. (ECF No. 1);

5 **WHEREAS**, on February 14, 2019, Plaintiff voluntarily dismissed Bitmain, Inc. from the
 6 case without prejudice (ECF No. 23);

7 **WHEREAS**, this matter has been stayed pending service via the Hague Convention on
 8 Defendant (ECF No. 26);

9 **WHEREAS**, on June 27, 2019, Plaintiff served Defendant with the Complaint pursuant to
 10 the Hague Convention, and Defendant is not challenging process or service of process;

11 **WHEREAS**, Defendant’s current deadline to respond to the Complaint is July 18, 2019;

12 **WHEREAS**, to conserve the resources of the Court and the Parties and to promote the
 13 efficient and orderly administration of justice, the Parties have conferred regarding Defendant’s
 14 response to the pending Complaint, Plaintiff’s anticipated filing of a First Amended Complaint, a
 15 briefing schedule regarding a possible motion to dismiss the First Amended Complaint, and
 16 rescheduling the Case Management Conference in this matter pending a ruling on the motion to
 17 dismiss.

18 **NOW, THEREFORE**, pursuant to Civil Local Rules 6-1(a), 6-1(b), 6-2, and 7-12, the
 19 undersigned Parties hereby stipulate and agree, subject to Court approval, that:

- 20 1. Plaintiff shall file a First Amended Complaint by August 30, 2019;
- 21 2. Defendant shall have until October 1, 2019, to answer or otherwise respond to
 22 Plaintiff’s First Amended Complaint;
- 23 3. In the event that Defendant files a motion to dismiss or other motion in response to
 24 the First Amended Complaint, Plaintiff shall have until October 23, 2019, to file any opposition
 25 to the motion;
- 26 4. Defendant shall have until November 7, 2019, to file any reply in support of the
 27 motion;
- 28 5. The motion shall be heard on November 21, 2019, at 11:00 a.m. or on the Court’s

1 first available hearing date thereafter; and

2 6. The date for the Case Management Conference shall be set at the hearing on the
3 motion to dismiss or shall otherwise be set by the Court after a determination regarding any
4 challenge to the First Amended Complaint.

5 **IT IS SO STIPULATED.**

6 Dated: July 12, 2019

7 /s/ Jordan L. Lurie

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Counsel for Plaintiff

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1 Dated: July 12, 2019

/s/ Carlos M. Lazatin

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14 *Counsel for Defendant Bitmain Technologies,*
15 *Ltd.*

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that the concurrence in the filing of this document has been obtained from all signatories above.

Dated: July 12, 2019

Respectfully submitted,

O'MELVENY & MYERS LLP

By: /s/ Carlos M. Lazatin

Attorneys for Defendant
Bitmain Technologies, Ltd.

[PROPOSED] ORDER

The Court, having considered the Joint Stipulation submitted by the Parties, and good cause appearing:

1. The Joint Stipulation is approved;
2. Plaintiff shall file a First Amended Complaint by August 30, 2019;
3. Defendant shall have until October 1, 2019, to answer or otherwise respond to Plaintiff's First Amended Complaint;
4. In the event that Defendant files a motion to dismiss or other motion in response to the First Amended Complaint, Plaintiff shall have until October 23, 2019, to file any opposition to the motion;
5. Defendant shall have until November 7, 2019, to file any reply in support of the motion;
6. The motion shall be heard on November 21, 2019, at 11:00 a.m. or on the Court's first available hearing date thereafter; and
7. The date for the Case Management Conference shall be set at the hearing on the motion to dismiss or shall otherwise be set by the Court after a determination regarding any challenge to the First Amended Complaint.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

Hon. James Donato
UNITED STATES DISTRICT JUDGE